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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, Individually and On Behalf of All Others Similarly Situated,	:	1:03-cv-12628 (NG)
Plaintiff,	:	RELATED ACTIONS:
vs.	:	1:04-cv-10046 (NG)
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	1:04-cv-10055 (NG)
Defendants.	:	1:04-cv-10065 (NG)
	:	1:04-cv-10077 (NG)
	:	1:04-cv-10078 (NG)
	:	1:04-cv-10090 (NG)
	:	1:04-cv-10144 (NG)
	:	1:04-cv-10155 (NG)
	:	1:04-cv-10179 (NG)
	:	1:04-cv-10189 (NG)
	:	1:04-cv-10190 (NG)
	:	1:04-cv-10202 (NG)
JOHN G. ESPOSITO, JR., Individually and On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	1:04-cv-10013 (NG)
vs.	:	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	
Defendants.	:	
JOSEPH L. KING, Individually and On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	1:04-cv-10038 (NG)
vs.	:	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	
Defendants.	:	

MOTION OF THE HOMEYER GROUP FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL

William E. Homeyer, Jr., William Kim, Gernot Buerger, Thomas Echlin, and Richard M. Acuna (collectively, the "Homeyer Group" or "Movants"), by their counsel, hereby move this Court for an Order: (i) consolidating the above-captioned actions; (ii) appointing the Homeyer Group as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"); and (iii) approving the Homeyer Group's selection of Milberg Weiss Bershad Hynes & Lerach LLP and Rabin, Murray & Frank LLP as Co-Lead Counsel, and Moulton & Gans, P.C. as Liaison Counsel of the actions, pursuant to the PSLRA. In support of this Motion, Movants submit herewith a Memorandum of Law, a Declaration, and a [Proposed] Order.

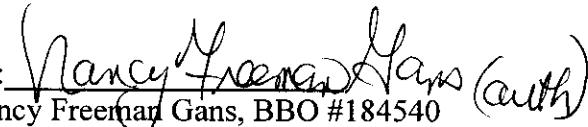
REQUEST FOR ORAL ARGUMENT

Movants respectfully request oral argument on this motion.

DATED: March 1, 2004
Boston, Massachusetts

Respectfully submitted:

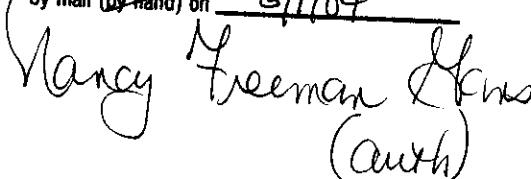
MOULTON & GANS, P.C.

By: 
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Proposed Liaison Counsel

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CERTIFICATE OF SERVICE
 I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail (by hand) on 3/1/04


 Nancy Freeman Gans
 (auth)

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Proposed Co-Lead Counsel

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